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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LATESHA WATSON,
Plaintiff,

v.

CITY OF HENDERSON; BRISTOL
ELLINGTON; KEVIN ABERNATHY;
KENNETH KERBY; DEBRA MARCH;
RICHARD DERRICK; RICHARD
MCCANN; NICK VASKOV; KRISTINA
GILMORE; DOES I through X, inclusive,
Defendants.

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION TO EXTEND
DEADLINE FOR FILING DISCOVERY
PLAN AND PROPOSED SCHEDULING
ORDER
(First Request)**

IT IS HEREBY Stipulated, by and between Plaintiff, Latesha Watson, by and through counsel, Marc P. Cook, Esq. of Cook & Kelesis, Ltd.; Defendants, City of Henderson, Bristol Ellington, Kristina Gilmore, Debra March, Nick Vaskov, by and through Richard Gordon of Snell & Wilmer; and Defendants, Kevin Abernathy, Kenneth Kerby, and Richard McCann, by and through Nicholas Wieczork of Clark Hill, PC, that the time within which the parties to submit their Proposed Discovery Plan and Scheduling Order pursuant to F.R.Civ.P. 26(f) be extended fourteen (14) days – until Monday, February 15, 2021.

This extension is necessary as a result of the extended briefing schedule that has been established for Defendant's pending Motions to Dismiss (Doc. 33, 35 and 36), the complexity of the claims at issue, and the volume of documentary evidence in the matter.

This first request to extend is made in good faith and not for the purpose of delay.

DATED this 1st day of February, 2021

DATED this 1st day of February, 2021

COOK & KELESIS, LTD.

SNELL & WILMER

By: /s/ Marc P. Cook

By: /s/ Richard C. Gordon

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*Attorneys for Defendants City of
Henderson, Debra March, Richard Derrick,
Bristol Ellington, Nicholas Vaskov and
Kristina Escamilla Gilmore*

CLARK HILL PLLC

DATED this 1st day of February, 2021

By: /s/ Nicholas M. Wieczorek

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Las Vegas, NV 89169
Telephone: (702) 862-8300
Facsimile: (702) 862-8400
*Attorney for Defendants Kevin Abernathy,
Richard McCann, and Kenneth Kirby*

It is so ORDERED.



UNITED STATES MAGISTRATE JUDGE

Submitted by:
COOK & KELESIS, LTD.

By: /s/ Marc P. Cook

Marc P. Cook, Esq.
Attorneys for Defendants

From: [Wieczorek, Nicholas](#)
To: [Gordon, Richard](#); [Sherri Grotheer](#); [Byrne, Pat](#); [Prior, Swen](#)
Cc: [Marc Cook](#); [Julie Sanpei](#)
Subject: RE: Watson v. City of Henderson, et al; Case 2:20-cv-01761
Date: Monday, February 1, 2021 11:30:03 AM

I also approve your using my e-signature for filing

Nicholas M Wieczorek
Member

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From: Gordon, Richard <rgordon@swlaw.com>
Sent: Monday, February 01, 2021 11:29 AM
To: Sherri Grotheer <SGrotheer@bckltd.com>; Wieczorek, Nicholas <nwieczorek@clarkhill.com>;
Byrne, Pat <pbyrne@swlaw.com>; Prior, Swen <sprior@swlaw.com>
Cc: Marc Cook <MCook@bckltd.com>; Julie Sanpei <JSanpei@bckltd.com>
Subject: RE: Watson v. City of Henderson, et al; Case 2:20-cv-01761

[External Message]

Hi Sherri,
You have my approval to e-sign the stipulation.

All the best,

Rick

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